

**From:** [REDACTED]  
**To:** [SizewellC](#)  
**Subject:** Additional Submission  
**Date:** 11 February 2021 12:14:30

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Dear Sir/Madam,

I have examined the PIN's Procedural Decision letter dated 22 January 2021 with specific regard to matters under Confidential Documents alongside the Applicant's letter of 8 January 2021 which responded to PINS previous request for further explanation of the commercially sensitive aspect of the documents.

As a retired consultant geotechnical engineer I do not accept the following:

- that the content of all four documents has commercial sensitive information. Other than the document 6.3 Volume 2 Main Development Site Chapter 18 Geology and Land Quality Appendix L of Appendix 18A - Pre-existing Geotechnical Data Synthesis and Interpretative Report, the titles of the other reports indicate they are reports on factual information gathered by others. They thus will, in all normal circumstances, contain no commercially sensitive content unless there is the very odd instance of some interpretation which could be redacted.
- I am unable to review the interpretation of the historic documentation by the Applicant but must rely upon the Applicant's own interpretation of the information in those documents. I am thus unable to determine the completeness and accuracy of the interpretations made. This is against the norms of professional geotechnical and engineering practice.
- that these documents can be used by the Applicant for its commercial purposes but not by Interested Parties who will not be using the documents for commercial purposes. The Applicant, by its own admission, in its letter of 8 January 2021, has stated it has been unable to contact the Project Manager or consultancies who produced the reports but it has used the reports. I consider the Applicant has effectively stated it has potentially breached the copyright and intellectual property rights of third parties it has been unable to contact, which is a most unusual admission.

Whilst I accept that some of the information in the reports will have been surpassed by more recent ground investigation and monitoring data provided within Volume 2, Chapter 18, Appendix 18A, it is vitally important in reviewing others work, in this case the Applicant's interpretation, that one is able to compare, and contrast, the data so as to ascertain whether interpretation by the Applicant is the only interpretation that can be made. This is standard industry practice when reviewing interpretative geotechnical reports. Thus, in my view, the documents are important to the completeness of the examination of the Application. I believe the Procedural Decision on these documents should be revisited by the Examiners.

Yours faithfully,  
Robin Sanders